

# Sage Legal LLC

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January 24, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Taryn A. Merkl, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13D South  
Brooklyn, NY 11201-1804

**Re: Hernandez v. Happy Street LLC, et al.**  
**Case No.: 1:22-cv-6918 (DG) (TAM)**

Dear Judge Merkl:

This firm represents the Defendants in this case, who respectfully submit this letter motion to adjourn the settlement conference and for an extension of time to submit *ex parte* settlement statements. Upon completing yesterday's telephonic pre-motion and discovery conference, your undersigned contacted the Defendants to apprise them of the Thursday, January 30, 2025 settlement conference. The individual Defendant is currently in the State of Florida and cannot appear due to health reasons (i.e., medical appointments) and, separately, cannot currently afford to come to New York due to travel and lodging costs as he no longer maintains a residence within the state.

Accordingly, sufficient good cause exists for this Court to exercise its discretion in favor of adjourning the settlement conference and granting an extension of time to submit *ex parte* settlement statements. See Fed. R. Civ. P. 6(b)(1)(B). Plaintiff does not consent to Defendants' request for a *sine die* extension. If Defendants are earnestly interested in resolving the instant action, before the incurrence of further attorneys' fees and costs, Plaintiff is amenable to converting the in-person Settlement Conference to a virtual conference. Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York  
January 24, 2025

Respectfully submitted,  
**SAGE LEGAL LLC**  
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**VIA ECF**

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